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*Attorneys for Plaintiff and the Proposed Class*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

**TOY-KNOWLOGY INC.**, on behalf of  
 itself and all others similarly situated,

Plaintiff,

v.

**Elna Co., Ltd.,  
 Elna America Inc.,  
 Hitachi Chemical Co., Ltd.,  
 Hitachi Chemical Co. America, Ltd.,  
 KEMET Corporation,  
 KEMET Electronics Corporation,  
 Matsuo Electric Co., Ltd.,  
 NEC TOKIN Corporation,  
 NEC TOKIN America Inc.,  
 Nichicon Corporation,  
 Nichicon America Corporation,  
 Nippon Chemi-Con Corporation,  
 United Chemi-Con, Inc.,  
 Panasonic Corporation,  
 Panasonic Corporation of North  
 America, SANYO Electric Co., Ltd.,  
 SANYO Electronic Device (U.S.A.)  
 Corporation,  
 Rubycon Corporation,  
 Rubycon America Inc., and  
 Toshin Kogyo Co., Ltd.**

Defendants.

Case No. 14-cv-04657-MEJ

Master File No.: 14-cv-03264-JD

**ADMINISTRATIVE MOTION TO  
 CONSIDER WHETHER CASES  
 SHOULD BE RELATED PURSUANT  
 TO CIVIL LOCAL RULE 3-12**

The Honorable James Donato

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that Plaintiff TOY-KNOWLEDGE INC. submits this Administrative Motion to Consider Whether Cases Should be Related pursuant to Civil Local Rules 3-12 and 7-11. Plaintiff requests the Court to consolidate *Toy-Knowledge Inc. v. Elna Co., Ltd.*, Case No. 14-cv-04657-MEJ (“Toy-Knowledge Action”), with *In re Capacitors Antitrust Litigation*, Master File No. 3:14-cv-03264-JD, for all pretrial proceedings before this Court.

**A. INTRODUCTION**

On October 2, 2014, the Honorable James Donato issued a Consolidation and Case Management Order consolidating Case Nos. 3:14-cv-03264-JD, 3:14-cv-03300-JD, 3:14-cv-03698-JD, 3:14-cv-03815-JD, and 3:14-cv-04123-JD into *In re Capacitors Antitrust Litigation*, Master File No. 14-3264, for all pretrial proceedings. These cases concern an alleged conspiracy to fix, raise, maintain, and/or stabilize prices for aluminum and tantalum electrolytic capacitors.

The Toy-Knowledge Action meets the requirements of Civil Local Rules 3-12 and 7-11 to be related to *In re Capacitors Antitrust Litigation*. Plaintiff TOY-KNOWLEDGE INC. respectfully requests the Court issue an order formally relating this case to *In re Capacitors Antitrust Litigation*.

**B. RELATIONSHIP OF THE ACTIONS**

The Toy-Knowledge Action involves substantially overlapping parties and events as cases that are part of *In re Capacitors Antitrust Litigation*. All actions allege that defendants engaged in a conspiracy to fix, raise, maintain, and/or stabilize prices for aluminum and tantalum electrolytic capacitors, in violation of the Sherman Act, 15 U.S.C. § 1 and/or California’s antitrust and unfair competition laws.

Plaintiff Toy-Knowledge seeks to represent a class of indirect purchasers that bought capacitors from U.S. distributors for incorporation into other products.

Pursuant to Local Rule 3-12(b)(2), it appears likely that there will be an unduly burdensome duplication of labor and expenses or the possibility of conflicting results if the cases are conducted before different judges. Therefore, it will be more efficient for all cases to proceed before the same judge so that these analyses and determinations are made by one Court.

**C. CONCLUSION**

This action satisfies the criteria of Rule 3-12(b)(2). Plaintiff TOY-KNOWLEDGE INC. therefore respectfully requests that this case be deemed related to *In re Capacitors Antitrust Litigation* and that it be assigned to the Honorable James Donato.

Dated: October 20, 2014

Respectfully submitted,

/s/ Steven N. Williams

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